



December 28, 2018

United States Army Corps of Engineers
South Pacific Division

RE: Koppers Temporary Debris Handling Facility Environmental Assessment – Finding
of No Significant Impact (FONSI)

The Butte County Air Quality Management District (District) appreciates the opportunity to comment on the Finding of No Significant Impact for the project listed above. Based on the information reviewed, the District has the following comments. Our comments are limited to Section 3.4 "Air Quality":

1. Section 3.4.2 states that the Governor has suspended state statutes, rules, regulations, and requirements. Based on our discussion with state officials it is not clear that any state air quality-related regulations have been suspended, except as noted below (see item 3). Regardless, local rules and regulations of the Butte County Air Quality Management District still apply to this project, including Rule 205 "Fugitive Dust Emissions" and Regulation IV "Permits". Local District air quality rules and regulations may be found at the following website: <https://www.arb.ca.gov/drdb/but/cur.htm> Please see comment below on the use of portable equipment.
2. Emissions estimates were not reported for the project. Emissions should be estimated and reported. The section does not address the impacts of mobile equipment and transport trucks to and on site. We expect localized diesel particulate and oxides of nitrogen (NOx) emissions from truck traffic and idling. Please note that California Air Resources Board (CARB) truck idling regulations may apply.
3. The District anticipates that portable equipment will be utilized at this project. Under the current State Portable Equipment Regulations, Title 17, California Code of Regulations 93116 (effective November 30, 2018), "portable" equipment and engines as specified may be used at the site under an emergency exemption for up to 12 months, subject to reporting to CARB. During this period, District air quality permitting would not be required. Use of portable equipment beyond 12 months would be subject to local District air quality permitting regulations.
4. The District concurs with the BMPs proposed in Section 3.4.5 with the following comments:
Air Quality BMP-1: air quality monitoring should include PM10 and PM2.5 monitoring. Initial monitoring for metals and asbestos is recommended due to the nature of the proposed metal shredding and concrete crushing activities. Monitoring frequency may be amended if data suggests insignificant impacts.

Air Quality BMP-2: the District requests the air quality control plan for review and comment. This should occur and comments resolved before processing occurs at the site. Dust control will be the most significant air quality mitigation for this project and District Rule 205 applies. Consideration should be given to utilizing current tiered diesel engines to the extent practicable as a mitigation.

Air Quality BMP-3: the District supports posting air quality monitoring data as soon as it becomes available, even if it must be labeled as preliminary – subject to quality assurance review.

5. The following is a clarification of the current attainment status. The area of the Koppers site is in attainment with the federal 24-hour PM_{2.5} standard as of July 2018, although there is an existing Maintenance Plan to keep the area in attainment through 2030. The District remains in nonattainment for the state Annual PM_{2.5} standard. A list of current attainment status for the area is below.

Pollutant	State Designation	Federal Designation
1-hour ozone	Nonattainment	No Standard
8-hour ozone	Nonattainment	Nonattainment
Carbon monoxide	Attainment	Attainment
Nitrogen Dioxide	Attainment	Attainment
Sulfur Dioxide	Attainment	Attainment
24-Hour PM ₁₀	Nonattainment	Attainment
24-Hour PM _{2.5}	No Standard	Attainment
Annual PM ₁₀	Attainment	No Standard
Annual PM _{2.5}	Nonattainment	Attainment

If you have any questions, please contact me at 530-332-9400 x 112.

Sincerely,



W. James Wagoner
Air Pollution Control Officer